

BELL ATLANTIC RESPONSE TO MA DTE KPMG EXCEPTION

Exception #:	14
Component:	Observation #94 (Issues 94.1 and 94.2) stated that Bell Atlantic-Massachusetts' (BA-MA) process for implementing, documenting and tracking metrics change proposals is inadequate and incomplete. BA-MA's response to this observation does not allow for an adequate retest of the metrics change control process.
Domain:	POP
Date Uncovered by KPMG:	6/30/00
Date BA Received:	6/30/00
Date BA Responded:	7/10/00
KPMG Summary Statement and	The substantial changes to BA-MA algorithms are not clearly documented and such modifications have hindered KPMG's replication efforts. CLECs may be adversely impacted by the inconsistent implementation and tracking, and inadequate notification processes, for changes to Pre-Order Metrics calculation algorithms.
BA Response:	<p><u>7/10/00 BA Response to Exception</u></p> <p>Updated response: As BA has started using the metrics change control process in MA, it has undertaken an internal compliance review process. The process included four review sessions for data providers, which have been completed, to review and discuss the metrics change control process.</p> <p>The meetings covered the Change Control Process, with a particular focus on areas identified by KPMG (test files, communication of completed changes, etc.) Key points covered included:</p> <ul style="list-style-type: none">• Making no changes without a Change Control Request.• Communication to change control of Internal Change Control information (WKRQ #'s, TGS #'s, etc).• Test File submissions with appropriate Tag line identification prior to implementing a change in production.• Transmission of a Data Provider Validation Form proving testing of changes and issue resolution.• The Wholesale Metrics Document Library and its contents.• Future Process Improvement of a New Database to partially automate and enhance the Change Control Process. <p>In addition, the organization responsible for metrics change control has been significantly expanded. A director has been assigned responsibility for "metric development" with a key focus on change control. Additional staff has been added on a short term and long term basis to ensure continued compliance with the BA-MA process.</p> <p>BA has also made additional improvements to the process. These improvements include:</p>

- The development of a LOTUS NOTES database for notification, issuance, approval and tracking of change control requests. A contractor has been on sight for the month of June and has delivered initial templates which are being reviewed and tested this week. A copy of the final version will be provided to KPMG upon successful testing. This database will enable state specific tracking of change control. Until the database is available, BA has improved the review and approval process.
- To address the issue of a single change control with unrelated issues, BA is sub-dividing requests according to data provider/domain when a single regulatory requirement (i.e., new guidelines) is required.
- Adherence to tracking in change control register.